

Amy Baggio, OSB #011920
amy@baggiolaw.com
Baggio Law
621 SW Morrison, Suite 1025
Portland, OR 97205
Tel: (503) 222-9830
Fax: (503) 274-8575

Attorney for Defendant

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON**

UNITED STATES OF AMERICA,

No. 3:16-cr-00051-BR-03

Plaintiff,

v.

**DEFENDANT'S UNOPPOSED MOTION
FOR REVOCATION OF RELEASE
ORDER**

JOSEPH O'SHAUGHNESSY,

Defendant.

The defendant, Joseph O'Shaughnessy, through counsel Amy Baggio, hereby moves the Court for an Order revoking the Order Setting Conditions of Release entered on February 2, 2016. (CR-54.)

CERTIFICATE OF CONFERRAL

Undersigned counsel conferred with the government, through Assistant United States Attorney Craig Gabriel, who consents to this motion.

PROCEDURAL POSTURE & BASIS FOR REQUEST

Mr. O'Shaughnessy was released to the supervision of United States Pretrial Services on February 5, 2016. (CR-107.) Because he resides in Arizona, the District of Arizona Pretrial Services

Office agreed as a courtesy to supervise Mr. O'Shaughnessy. During his time on pretrial release, Mr. O'Shaughnessy remained in full compliance with all conditions of supervision.

On March 2, 2016, Mr. O'Shaughnessy was indicted in the District of Nevada, case number 2:16-cr-00046. He was arrested the following day in the District of Arizona while checking in with his United States Pretrial Services Officer. Mr. O'Shaughnessy moved for release in the District of Arizona on the District of Nevada matter; Pretrial Services recommended his continued release. The magistrate judge in Arizona denied the motion for release and Mr. O'Shaughnessy has remained in detention on the Nevada case since his arrest on March 2nd. Mr. O'Shaughnessy was transported from Arizona to Nevada and is currently in custody at CCA Southern District of Nevada.

On March 22, 2016, the Court entered an Order which directed, among other things, that the United States Marshal (USM) move Mr. O'Shaughnessy to the District of Oregon from his current detained location in Nevada. (CR-334 at 6-7.) On April 11, 2016, AUSA Craig Gabriel informed undersigned counsel that in order to effectuate Mr. O'Shaughnessy's transport to Oregon by the USM, a motion for revocation of the District of Oregon release order was necessary.

Accordingly, in order to effectuate this Court's Order of March 22, 2016, as it pertains to Mr. O'Shaughnessy, counsel hereby moves for revocation of the previously entered release order. As noted above, the government, through AUSA Gabriel, has no objection to this motion.

Respectfully submitted on April 13, 2016.

/s/ Amy Baggio
Amy Baggio, OSB #011920
503-222-9830
Attorney for Defendant O'Shaughnessy